

To: rlaw@demaximis.com[]
Cc: BudneySL@cdm.com;CN=Charles Nace/OU=R2/O=USEPA/C=US@EPA;CN=Marian Olsen/OU=R2/O=USEPA/C=US@EPA;Elizabeth.A.Buckrucker@usace.army.mil[]; N=Charles Nace/OU=R2/O=USEPA/C=US@EPA;CN=Marian Olsen/OU=R2/O=USEPA/C=US@EPA;Elizabeth.A.Buckrucker@usace.army.mil[]; N=Marian Olsen/OU=R2/O=USEPA/C=US@EPA;Elizabeth.A.Buckrucker@usace.army.mil[]; lizabeth.A.Buckrucker@usace.army.mil[]
Bcc: []
From: CN=Stephanie Vaughn/OU=R2/O=USEPA/C=US
Sent: Mon 9/24/2012 3:48:57 PM
Subject: Comments on background QAPPs, and Toxicity Testing report
[Comments Background Tissue QAPP.docx](#)
[ATT4BX9T.docx](#)

Hi Rob,

Attached are EPA's comments on the Background Tissue Collection QAPP submitted on 9/14/2012, as well as preliminary comments on the sediment collection QAPP.

Also attached are EPA and partner agency comments on the Toxicity Data Report which was submitted in January 2012. I am submitting these comments at this time because they should be incorporated into the sediment and tissue collection and analysis efforts.

I have sent all of these comments to the partner agencies for review, and have asked them to submit comments on the tissue QAPP addendum by Thursday of this week, and on the sediment QAPP addendum by the end of next week. In the email I sent them, I included the following statement:

While we are all still trying to come to resolution on the overall background and reference approach to be used for this site, I think we can all agree that additional data above Dundee Dam will be useful. SQT samples below the dam were collected previously during the fall, so it makes sense to collect samples above the dam, to be used for comparison purposes, during the same general time frame. As such, EPA directed the CPG to submit these QAPPs, with the understanding that additional background/reference sampling may be required once the overall approach is agreed upon. This additional sampling (i.e., beyond what's included in the QAPPs submitted on 9/14) can hopefully still be conducted later this fall.

Please consider this statement part of the comments that EPA is submitting on these documents.

Let me know if you have any questions.

Thanks,
Stephanie

EPA's preliminary comments on the Background Sediment Collection QAPP:

-- The sampling locations should not be near CSOs or other point sources. A reconnaissance trip is planned, but in addition, CDM, and Chuck Nace as possible, will provide oversight in the field to assure that this doesn't happen.

-- For the proposed toxicity testing, the errors that were made with the previous toxicity testing should not be repeated. Comments on the previous toxicity testing are provided in the attached document.

